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Attorneys for Defendants
YOUTUBE, LLC, GOOGLE LLC and
ALPHABET INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

MDL No. 3047

CASE NO.: 4:22-md-03047-YGR

Honorable Thomas S. Hixson

This Filing Relates to:

ALL ACTIONS

**STIPULATED REQUEST FOR
ORDER CHANGING TIME (ESI
PROTOCOL)**

Pursuant to Civil Local Rules 6-1(b) and 6-2, the parties, through their undersigned counsel, hereby stipulate and respectfully request that the Court extend the deadline to file a proposed ESI Protocol or letter briefing on disputes regarding that order to July 13, 2023. The parties declare in support of this request:

1. Pursuant to Case Management Order No. 5 (Dkt. 164), the parties are currently negotiating a proposed ESI Protocol;
2. The parties previously stipulated to extend the deadline to file a joint proposed ESI Protocol or letter briefing on disputes regarding that order on two occasions, with the current deadline being June 9, 2023;
3. The parties have continued to work diligently to eliminate or narrow disputes over a proposed ESI Protocol, including by exchanging drafts and through a series of ongoing meet-and-confers;
4. The parties agree that they would benefit from more time to continue their conferrals and attempt to narrow the disputes regarding the ESI Protocol they ask the Court to resolve, and, particularly in light of various interim deadlines in this case, think that an extension until July 13 will afford adequate time for such negotiations;
5. Extending this deadline will not affect any other deadline affixed by the Court.

THEREFORE, pursuant to Local Rules 6-1(b) and 6-2, the parties stipulate and respectfully request that the Court extend the deadline to submit a joint proposed ESI Protocol or letter briefing regarding disputes over that order to July 13, 2023.

IT IS SO STIPULATED AND AGREED.

Dated: June 8, 2023

Respectfully submitted,

WILSON SONSINI GOODRICH & ROSATI
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ATTESTATION

I, Samantha A. Machock, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory thereto.

Dated: June 8, 2023

/s/ Samantha A. Machock
Samantha A. Machock